

# EXHIBIT II

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

1:16-cv-03088-ELR

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**GERONALD D. BELL**

*January 09, 2023*

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1 BY MS. TAYLOE:

2 Q So when we looked at the QBE formula --  
3 I'm sorry -- the QBE allotment sheet before, you  
4 confirmed GNETS funds were not included in that  
5 because it's a separate -- by a separate grant.

6 Can you please describe the GNETS funding  
7 for me, though?

8 A Yeah. So it's a separate funding formula.  
9 It in some ways look similar to GNETS -- I mean to  
10 QBE, but there's some -- several distinctions.

11 The way the student funding count is  
12 calculated is different. So the way the student  
13 count that you see in the funding formula, that's  
14 calculated a little bit differently. And the ratios  
15 don't tie exactly to any category that you see in  
16 QBE. It comes close to the Special Ed Category 3, I  
17 believe, or Category 4, one of those, but it's not  
18 exactly that either, so. But it's the same  
19 principal where, you know, the teacher funding is --  
20 the teacher salary is what influences the direct  
21 instruction money that they earn, and then they  
22 receive indirect instruction based on -- but again  
23 that's based on teacher salary, too, but that's  
24 based on, like I said, the directors and the -- I  
25 want to say psychologists and what-not, social

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1 workers.

2 But, yeah, so it mirrors QBE in that part  
3 of the funding that's determined by student counts,  
4 the instructional piece, and then there's a part of  
5 the funding that's determined by teacher training  
6 and experience. So, you know, based on T&E they'll  
7 get additional funding.

8 And then there's a final piece of the  
9 federal funding, which, like I said, the Federal  
10 Programs staff kind of determines how much they want  
11 to add to it or how they -- they have to set up a  
12 formula, at least that's my understanding, to, to  
13 determine how much goes to the districts.

14 So, yeah, I mean that's basically the high  
15 level. So I mean if you want to delve into  
16 something or...

17 Q Yeah. Before we go into the specifics,  
18 though, you mentioned indirect staff. Given the  
19 purposes of GNETS, are there more indirect staff or  
20 different ratios for the psychologists or social  
21 workers or any other indirect staff that might be  
22 included?

23 A I don't have the spreadsheet in front of  
24 me, so I don't know if it -- you know, if it's  
25 drastically different.

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1 fiscal agents, does that data play any role in the  
2 operation of this formula?

3 A Repeat that one more time. Sorry.

4 Q I'll lie a better foundation.

5 Are you familiar with the GNETS grant  
6 application?

7 A Not really, no.

8 Q Okay. Does your office have any  
9 involvement with the processing of the GNETS grant  
10 application?

11 A No.

12 Q Do you know where the numbers for applying  
13 this formula in the spreadsheet come from?

14 MS. HERNANDEZ: Objection.

15 A I do know that the -- yeah, the student  
16 count, that comes from student record data. The CPI  
17 data is submitted to us.

18 So those are the only two that go into the  
19 formula. Yeah. Those are the only two data points  
20 that we use in calculating the formula, at least  
21 that the budget office uses.

22 So I don't know what happens beyond that.

23 Q So student count would account for FTE,  
24 and T&E you mentioned, too. What about  
25 paraprofessional cost and support salary costs,

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1 where would that information for this formula come  
2 from?

3 A Those are based on student counts.

4 So the student count is what will drive  
5 the directs and most of the indirect instruction.  
6 There will be ratios based on student counts. So  
7 that will drive that.

8 The CPI data will drive the T&E and health  
9 insurance numbers that we calculate.

10 And then the student count data would be  
11 used to help calculating the federal funding piece  
12 as well.

13 Q Okay. So if students need different types  
14 of services, that wouldn't play a role in this  
15 formula?

16 A No.

17 Q And if students had more extensive needs  
18 than students in other GNETS programs, that's not  
19 accounted for in this formula?

20 A No.

21 MS. HERNANDEZ: Objection.

22 Q Is there any funding for training allowed  
23 for in this formula?

24 A I want to look at the spreadsheet to see  
25 if there's any professional development money in

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1 Q Okay. Was there anything comparable to  
2 the five mill local contribution requirement?

3 A No. Well, I mean, the austerity, yes, but  
4 I mean that's not the same thing. So, no, not  
5 really.

6 Q Any funding for specialist teachers for  
7 elementary students?

8 A Any funding? What do you mean by that?

9 Q On the QBE formula, for elementary  
10 students there's places for special like arts and  
11 music and special teachers like that.

12 A Oh. No, not specifically.

13 Q Any funding for a tech specialist?

14 A No.

15 Q Any funding for remediation?

16 A No, not specifically. No.

17 Q And any funding for English for Second  
18 Language Learners?

19 A No.

20 Q Then when we talked about the student  
21 count, we touched briefly on whether it counted  
22 students in the centers and classrooms. Do you know  
23 if there's any place in the formula for funding  
24 services provided by GNETS programs providing  
25 consultative services?

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1 Do you know what consultative services  
2 are?

3 A No.

4 Q Is there any funding that would appear in  
5 the formula for instances where a GNETS teacher goes  
6 to a student in a general education setting and  
7 supports the student or the student's teacher in  
8 that general education setting?

9 MS. HERNANDEZ: Objection.

10 A So I don't know how we categorize teachers  
11 -- so I would want to look it up before I answer  
12 definitively. But I assume there's a way to capture  
13 a teacher who helps out in the -- like I'm assuming  
14 they would be represented somewhere in the CPI data,  
15 even if it's just partial, you know, being  
16 represented in the CPI data for -- you know, that  
17 goes into a local school system who comes from a  
18 GNETS center and works in that local school system.

19 So at least as far as T&E. I'm assuming  
20 they would be captured, but I don't know off the top  
21 of my head.

22 Q That makes me wonder, the CPI data is  
23 reported by the LEAs reporting their own teachers,  
24 correct?

25 A Yes.



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1 Q So that might account for teachers in the  
2 LEA, but would the CPI data include teachers from a  
3 GNETS program that come into their classroom?

4 A I mean if you're coming into that LEA,  
5 then I'm assuming they're employing you on some  
6 level. Again, I'm not an expert on how -- what LEAs  
7 include in they're reporting, but I would think we  
8 would be able to capture that, or should be able to  
9 capture that.

10 Q So is it fair to say it's not in the GNETS  
11 formula, but if, if they're being funded, it would  
12 be through LEAs and their teacher reporting?

13 A That would be my assumption, but I don't  
14 know.

15 Q Are you aware of any sources of funding  
16 for students in a general education setting who are  
17 exhibiting emotional and behavioral challenges?

18 MS. HERNANDEZ: Objection.

19 A Not particularly.

20 MS. TAYLOE: I'm done with that exhibit,  
21 Allison.

22 Q Do you provide training to anybody about  
23 the GNETS funding formula?

24 A Not regularly but I have.

25 Q To whom?